

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [John M. Hoffman](#)  
**Subject:** RE: Comment Letters  
**Date:** Thursday, January 10, 2013 12:53:25 PM  
**Attachments:** [FINAL BERA LTR -ATTACHMENT.docx](#)


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To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "John M. Hoffman" <jmhoffman@ashland.com>

Ok, here's the comments. If the letter hasn't been signed yet, i'll change it to February 28th. If Geosyntec can't make that, just ask for an extension mid-Feb

*(See attached file: FINAL BERA LTR -ATTACHMENT.docx)*

 "McGowan, Carrie" ---01/10/2013 12:47:56 PM---Geosyntec does not believe they can revise the BERA including the new modeling and get it through th

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "John M. Hoffman" <jmhoffman@ashland.com>  
Date: 01/10/2013 12:47 PM  
Subject: RE: Comment Letters

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Geosyntec does not believe they can revise the BERA including the new modeling and get it through the review process and to you by Feb. 15. We request additional time - perhaps and extra 30 days.

Thanks,  
Carrie

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**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Wed 1/9/2013 9:14 AM  
**To:** McGowan, Carrie  
**Cc:** John M. Hoffman  
**Subject:** RE: Comment Letters

Ok, thanks. Here's how it looks like it's going to go.

You'll get a letter with the remaining comments on the BERA. This letter will ask that other species be modelled. We discussed this at the meeting, and BTAG remains adamant. It follows RAGs so it's the right thing to do. I told that to Dave hopefully he relayed the info. Once that's done, the BERA is approvable - i'm asking for the revised BERA by Feb. 15 (ok?).

You'll get a short approval letter for the off-site ditch RI work, contingent on some very minor changes. All you need to do is send in the final copy with a cover letter indicating the changes were made.

You'll get a letter with the FS comments. The comments we've been discussing, the ones you've seen previously in draft. Nothing in that letter is new and just about all of the comments have been addressed

by Gary either through draft changes to the text or through discussions. So why am i resending them? I think it would be best to have a paper trail of official letters showing the comments, and then a final document/cover letter showing the responses. This information will become part of the Admin Record.

I hope to get the BERA letter out today, the rest shall follow.

jon

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "John M. Hoffman" <jmhoffman@ashland.com>  
Date: 01/08/2013 09:48 AM  
Subject: RE: Comment Letters

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Jon,

The PM for Ashland will be:

John Hoffman

Project Manager

Ashland Inc.

EH&S, Remediation

500 Hercules Road

Wilmington, DE 19808-1599

302-995-3485

He is copied on this email so you also have his email address.

And John – you now have the email address of Jon Gorin – the EPA RPM for LCP!

Thanks,

Carrie

**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Monday, January 07, 2013 4:21 PM  
**To:** McGowan, Carrie  
**Subject:** Comment Letters

Carrie, who gets the comment letters?

Please send name, current title, address, company (assume Ashland) etc.

thanks, jon

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## ATTACHMENT

### General Comments:

EPA never approved the use of Old Place Creek as a reference location. This needs to be stated or clarified in the text.

### Specific Comments

1. Page 3-6 Section 3.3, Potential Ecological Receptors and Exposure Pathways. The following additional ecological exposure pathways should be evaluated in the Baseline Ecological Risk Assessment (BERA):
  - Exposure of estuarine fish to contaminated sediment, soil, water, and prey in South Branch Creek and its associated tidal wetlands.
  - Exposure of piscivorous mammals to contaminated sediment, soil, water, and prey in South Branch Creek and its associated tidal wetlands.
  - Exposure of sediment-probing birds to contaminated sediment, soil, water, and prey in South Branch Creek and its associated tidal wetlands.
  - Exposure of insectivorous birds to contaminated soil and prey in the terrestrial portions of the site.
2. Page 3-8, Section 3.4 BERA Assessment Endpoints: In this section, three receptors (macroinvertebrates, omnivorous mammals and piscivorous birds) were selected as the BERA assessment endpoints. Please also evaluate insectivorous birds, carnivorous mammals, and carnivorous birds as potential ecological receptors in this BERA. Insectivorous birds and red fox were documented during the EA to occur on site, and hawks were modeled in the SLERA with resultant HQs greater than 1.0 (Table Q-1).

The assessment endpoint for the protection of estuarine fish, identified in the Screening Level Ecological Risk Assessment (SLERA), was inappropriately eliminated from the Problem Formulation document. It must be reinstated for the ecological risk assessment, and a corresponding measurement endpoint (*e.g.* comparison of fish tissue data with tissue residue effects data such as *Jarvinen and Ankley, 1999*<sup>2</sup> and *Beckvar et al., 1996*<sup>3</sup>) must be provided in the final BERA.
3. Page 3-9 Section 3.5, Risk Questions. The following additional risk questions need to be addressed in the BERA:
  - Are COPEC concentrations in sediment, soil, water, and prey in South Branch Creek and its associated tidal wetlands sufficient to cause adverse ecological effects to estuarine fish?

Are COPEC concentrations in sediment, soil, water, and prey in South Branch Creek and its associated tidal wetlands sufficient to cause adverse ecological effects to piscivorous mammals?

Are COPEC concentrations in sediment, water, and prey of South Branch Creek and its associated tidal wetlands sufficient to cause adverse ecological effects to sediment-probing birds?

Are COPEC concentration in soil and prey of the terrestrial portions of the site sufficient to cause adverse ecological effects to insectivorous birds?

4. Page 4-3 Section 4.1, Measurement Endpoints.

Measurement endpoints for protection of estuarine fish should be identified and should, at a minimum, include comparison of concentrations of COPECs in fish tissue to toxicity reference values (TRVs).

Measurement endpoints for protection of piscivorous mammals should be identified and should, at a minimum, include food web modeling with comparison to TRVs.

Measurement endpoints for protection of sediment-probing birds should be identified and should, at a minimum, include food web modeling with comparison to TRVs.

Measurement endpoints for protection of insectivorous birds should be identified and should, at a minimum, include food web modeling with comparison to TRVs.

5. Page 7-11, Section 7.1.2, Receptor Exposure Assumptions. The following species should be added to those evaluated in this section:

Estuarine fish: Atlantic silverside

Sediment-probing bird: spotted sandpiper

Insectivorous bird: American woodcock

6. Page 6-8, Section 6.4.1, South Branch Creek Sediment.

The presence of arsenic in wetland and creek sediments at concentrations in excess of soils does not provide an indication of an off-site source. Contaminants typically accumulate in depositional sediments. This statement should either be clarified or removed.

7. Page 6-11, Section 6.4.3, South Branch Creek Surface Water.

All contaminants that exceed the more stringent of the federal Ambient Water Quality Criteria or the NJ Surface Water Quality Standards should be listed in this section.

8. Page 7-3, Section 7.1.4 Second Paragraph: The statement that South Branch Creek provides “limited support for wildlife populations” isn’t supported and should be removed.

9. Page 7-3, Section 7.1.4, Second Paragraph, Last Sentence: The closing statement “Wildlife exposure is likely to be only periodical by foraging species” is not well supported and should therefore be removed.